

LAW OFFICES

COHN AND MARKS LLP

ROBERT B. JACOBI
ROY R. RUSSO
RONALD A. SIEGEL
LAWRENCE N. COHN
RICHARD A. HELMICK
J. BRIAN DE BOICE
JEROLD L. JACOBS
KEVIN M. GOLDBERG

SUSAN V. SACHS

DIRECT DIAL:
202-452-4823

**SUITE 300
1920 N STREET N.W.
WASHINGTON, D.C. 20036-1622**

TELEPHONE: (202) 293-3860
FACSIMILE: (202) 293-4827
HOME PAGE: WWW.COHNMARKS.COM

OF COUNSEL:
MARCUS COHN (1913-2001)
LEONARD H. MARKS (RETIRED)
JOEL H. LEVY
ELLEN MANDELL EDMUNDSON

EMAIL ADDRESS:
jerold.jacobs@cohnmarks.com

June 29, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
Portals II, Filing Center, TW-A325
Washington, D.C. 20554

**Re: Prime Time Christian Broadcasting, Inc. (FRN 0004-3281-00)
Station KPTB-DT, Lubbock TX Facility ID #53544
Station KMLM-DT, Odessa TX Facility ID #53541
Station KRPV-DT, Roswell NM Facility ID #53539
Requests for Waiver of the Replication/Maximization
Interference Protection Deadline**

Dear Ms. Dortch

For good cause shown, in accordance with the procedures set forth in *Public Notice, DA 06-1255 (DTV Channel Election Issues)*, released June 14, 2006, this letter respectfully requests, on behalf of our client, Prime Time Christian Broadcasting, Inc. ("PTCB"), permittee of Stations KPTB-DT, Lubbock, Texas, KMLM-DT, Odessa, Texas, and KRPV-DT, Roswell, New Mexico, a six-month waiver of the July 1, 2006 replication/maximization interference protection deadline established by the Commission in Paragraph 78 of the *Second DTV Periodic Review Report and Order*, 19 FCC Rcd 18279 (2004).

The grounds for this waiver request are compliance delay circumstances in connection with the above-referenced *Public Notice* that are clearly beyond PTCB's control. Specifically, within only a few days after the *Public Notice* was released, PTCB filed the requisite FCC Form 301 applications to transform its three Special Temporary Authorizations ("STA's" or "STA") into modified DTV construction

permits.¹ Once these applications are granted, PTCB will be able to file the Form 302-DTV license applications that the *Public Notice* envisions. In the meantime, out of abundance of caution, PTCB has also filed STA extension or modification applications for all three DTV facilities. All three current STA operations fully meet PTCB's Paragraph 78 requirement of 80% replication of audiences served by the stations' 1997 analog facilities. Thus, the only reason for this waiver request is to signify the fact that the three subject stations are already in Paragraph 78 operational compliance and will be compliance with the application requirements of the *Public Notice* as soon as the pending Form 301 applications are granted and Form 302-DTV applications can be filed.

Accordingly, PTCB respectfully requests the Commission's understanding and indulgence and a six-month waiver of the July 1 *Public Notice* compliance date for all three stations. PTCB fully expects to file its three license applications well before the proposed January 1, 2007 extended deadline.

Please direct any communications or correspondence concerning this matter to the undersigned.

Sincerely

Jerold L. Jacobs

Jerold L. Jacobs
Counsel for Prime Time Christian
Broadcasting, Inc.

cc: Shaun Maher, Esq. (FCC - via e-mail)

¹ KPTB-DT: File No. BMPCDT-20060616AAZ, accepted for filing on June 21, 2006; KMLM-DT: File No. BMPCDT-20060616AAW, accepted for filing on June 21, 2006; and KRPV-DT: File No. BMPCDT-20060622AAL, accepted for filing on June 27, 2006.